

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:  
ANTHONY J. DERCOLE  
Debtor(s)

Bankruptcy No. 19-23948-CMB

Chapter 13

ANTHONY J. DERCOLE  
Movant(s)

Document No:

Related to Document No. 73

vs.

THE BANK OF NEW YORK MELLON  
CARRINGTON MORTGAGE SERVICES, LLC  
RONDA J. WINNECOUR, TRUSTEE  
Respondent(s)

**DEBTOR'S MOTION FOR LMP STATUS CONFERENCE**

The Debtor, Anthony J. Dercole ("Movant"), moves the Court to schedule a status conference for the LMP in this case, and in support thereof avers the following:

1. On February 26, 2021, Movant filed an amended Loss Mitigation Status Report at Document No. 73.
2. Movant believes that The Bank of New York Mellon and Carrington Mortgage Services, LLC (together "Respondents") are being uncooperative in the LMP process in this case.
3. Movant is therefore requesting Court intervention to schedule a status conference.
4. Movant believes that Respondents' good faith participation is needed to reach a loan modification.

WHEREFORE, Movant requests the Court schedule a status conference for the LMP and order any such further relief as the Court deems just and proper.

Respectfully submitted,

MOYNIHAN LAW PC

Dated: March 2, 2021

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